

Hearing Date: TBD
Objection Deadline: December 5, 2021 at 4:00 p.m. (AST)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**PROMESA
Title III**

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

**NOTICE OF FILING OF SEVENTH INTERIM FEE APPLICATION OF
GENOVESE JOBLOVE AND BATTISTA, P.A. AS SPECIAL LITIGATION
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF JUNE 1, 2021 THROUGH SEPTEMBER 30, 2021**

PLEASE TAKE NOTICE that on November 15, 2021, pursuant to this Court's *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Second Interim Compensation Order") [ECF No. 3269]; Genovese Joblove & Battista, P.A. ("GJB"), as special litigation counsel to the Official Committee of Unsecured Creditors (the "Committee")², in the above-captioned Title III cases, filed their *Seventh Interim*

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA

Fee Application of Genovese Joblove & Battista, P.A., as Special Litigation Counsel to Official Committee of Unsecured Creditors, for Services Rendered and Reimbursement of Expenses for Period of June 1, 2021 through September 30, 2021 (the “Application”)

PLEASE TAKE FURTHER NOTICE that any response or objection (“Objections”) to the Application by any party other than the Fee Examiner shall be (a) in writing, (b) shall conform to the Federal Rules of Bankruptcy Procedure, the Second Interim Compensation Order, and the Thirteenth Amended Case Management Procedures [ECF No. 13512]; and (c) be filed with the Court and served on the entities below, so as to be received on or before **December 5, 2021 at 4:00 p.m.** (AST) (the “Objection Deadline”):

- a. The Financial Oversight and Management Board, c/o Proskauer Rose LLP, Eleven Times Square, New York, NY 10036, Attn: Martin J. Bienenstock, Esq. (mbienenstock@proskauer.com) and Ehud Barak, Esq. (ebarak@proskauer.com), and Proskauer Rose LLP, 70 West Madison Street, Chicago, IL 60602, Attn: Paul V. Possinger, Esq. (ppossinger@proskauer.com);
- b. The Financial Oversight and Management Board as representative of The Commonwealth of Puerto Rico, O’Neill & Borges LLC, 250 Muñoz Rivera Ave., Suite 800, San Juan, PR 00918-1813, Attn: Hermann D. Bauer, Esq. (Hermann.bauer@oneillborges.com);
- c. Puerto Rico Fiscal Agency and Financial Advisory Authority, c/o Marini Pietrantoni Muniz LLC, MCS Plaza, Suite 500, 255 Ponce de León Ave., San Juan P.R. 00917, Attn.: Luis C. Marini-Biaggi, Esq. (lmardini@mpmlawpr.com) and Carolina Velaz Rivero Esq., (cvelaz@mpmlawpr.com);
- d. Puerto Rico Fiscal Agency and Financial Advisory Authority, c/o O’Melveny & Myers LLP, Times Square Tower, 7 Time Square, New York, NY 10036, Attn: John J.

Rapisardi, Esq. (jrapisardi@omm.com), Suzanne Uhland, Esq. (suhland@omm.com), and Diana M. Perez, Esq. (dperez@omm.com);

e. The Office of the United States Trustee for the District of Puerto Rico, Attn: Monsita Lecaroz, Esq, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, Puerto Rico, 00901. (monsita.lecaroz@usdoj.gov);

f. The Official Committee of Unsecured Creditors, c/o Paul Hastings LLP, 200 Park Ave., New York, NY 10166, Attn: Luc A. Despins, Esq. (lucdespins@paulhastings.com);

g. The Official Committee of Unsecured Creditors, Casillas, Santiago & Torres LLC, El Caribe Office Building, 53 Palmeras Street, Ste. 1601, San Juan, PR 00901, Attn: Juan J. Casillas Ayala, Esq. (jcasillas@cstlawpr.com) and Alberto J.E. Añeses Negrón, Esq. (aaneses@cstlawpr.com);

h. The Official Committee of Retired Employees, c/o Jenner & Block LLP, 919 Third Ave., New York, NY 10022, Attn: Robert Gordon, Esq. (rgordon@jenner.com); Richard Levin, Esq. (rlevin@jenner.com); and Jenner & Block LLP, 353 N. Clark Street, Chicago, IL 60654, Attn: Catherine Steege, Esq. (csteege@jenner.com) and Melissa Root, Esq. (mroot@jenner.com);

i. The Official Committee of Retired Employees, c/o Bennazar, García & Milián, C.S.P., Edificio Union Plaza, PH-A, 416 Ave. Ponce de León, Hato Rey, PR 00918, Attn: A.J. Bennazar Zequeira, Esq. (ajb@bennazar.org);

j. The Puerto Rico Department of Treasury, P.O. Box 9024140, San Juan, Puerto Rico 00902. Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting (Reylam.Guerra@hacienda.pr.gov); Omar E. Rodríguez Pérez, CPA, Assistant Secretary of Central Accounting (Rodriguez.Omar@hacienda.pr.gov); Angel L. Pantoja Rodríguez, Deputy Assistant Secretary of Internal Revenue and Tax Policy

(angel.pantoja@hacienda.pr.gov); Francisco Parés Alicea, Assistant Secretary of Internal Revenue and Tax Policy (francisco.pares@hacienda.pr.gov); and Francisco Peña Montañez, CPA, Assistant Secretary of the Treasury (Francisco.Pena@hacienda.pr.gov);

k. Counsel to any other statutory committee appointed;

l. The Fee Examiner, c/o EDGE Legal Strategies, PSC, 252 Ponce de León Avenue, Citibank Tower, 12th Floor, San Juan, PR 00918, Attn: Eyck O. Lugo (elugo@edgelegalpr.com); and Godfrey & Kahn, S.C., One East Main Street, Suite 500, Madison, WI 53703, Attn: Katherine Stadler (KStadler@gklaw.com).

PLEASE TAKE FURTHER NOTICE that if (a) no objection is timely filed and served in accordance with the Interim Compensation Order and Case Management Procedures, and (b) all issues raised by the Fee Examiner are consensually resolved, the relief requested may be granted without a hearing.

Copies of all documents filed in these Title III cases are available (a) free of charge by visiting <https://cases.primeclerk.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court's website at <https://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

Dated: November 15, 2021

/s/ John Arrastia

GENOVESE JOBLOVE & BATTISTA, P.A.

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/s/ Juan J. Casillas Ayala

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